



## State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
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Governor

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Lt. Governor

BOB MARTIN  
Commissioner

Patricia Simmons-Pierre  
Remedial Project Manager  
USEPA Region 2  
290 Broadway, 20<sup>th</sup> Floor  
New York, NY 10007-1866

December 30, 2015

Re: L. E. Carpenter  
Wharton, Morris County, New Jersey  
SRP PI# 003017

Dear Ms. Simmons-Pierre:

The New Jersey Department of Environmental Protection (NJDEP or Department) has completed a review of the Work Plan for Ecological Evaluation of the Eastern Drainage Ditch and Rockaway River dated December 10, 2015, submitted pursuant to CERCLA and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (Tech Rules).

The Department's comments on the submittal are provided below.

### *Eastern Drainage Ditch*

1. Page 2 of 8 – Based on the current information it is the NJDEP's position that the Eastern Drainage Ditch meets the criteria of an Environmentally Sensitive Natural Resource (ESNR) as spelled out in NJDEP's Ecological Evaluation Technical Guidance (EETG) and "functions as an ESNR". The Work Plan for Ecological Evaluation must be revised to include investigation of the Eastern Drainage Ditch.
2. Page 4 of 8 – L.E. Carpenter is requested to provide their basis for stating "the Eastern Drainage Ditch is predominantly comprised of stormwater. It has been understood this ditch receives significant direct ground water discharge.

Further information on upstream surface water sample locations and their relationship to the Eastern Drainage Ditch is required.

Background or upstream samples need to be collected coterminally with samples collected in either the Eastern Drainage Ditch or the Rockaway River.

### *Pore Water*

1. Page 5 of 8 – It is critical that representative sediment porewater samples be collected



in order to accurately evaluate potential impacts of ground water discharges to surface water bodies. If former sampling locations cannot be resampled, adjacent new locations must be sampled.

2. Proposed sample locations along transects in both the Rockaway River and Eastern Drainage Ditch must include locations where the highest contaminant concentrations were previously detected.

*Rockaway River*

1. Page 7 of 8 - Use of Washington Pond (lentic habitat) as a background location (e.g., Transect C) for the Rockaway River (lotic habitat) is less than optimal. As detailed in NJDEP's EETG, whenever possible, similar habitat must be selected for background determinations.

Please incorporate these comments into the letter that the USEPA will be sending to L.E. Carpenter.

If you have any questions regarding this matter I may be contacted at (609) 633-1416, or at Anthony.Cinque@dep.state.nj.us.

Sincerely,



Anthony Cinque, Case Manager  
Bureau of Case Management

cc: Steve Byrnes, NJDEP/BEERA  
Daryl Clark, NJDEP/BGWPA